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August 27, 2019

Hon. Roanne L. Mann
Chief Magistrate Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Kaplan, et al. v. Central Bank of the Islamic Republic of Iran, et al.*
19-cv-03142 (ENV) (rml)

Dear Judge Mann:

We represent the plaintiffs in the above referenced action, which was reassigned to Judge Glasser and Your Honor yesterday.

We write to respectfully call to Your Honor's attention plaintiffs' pending application made to Magistrate Judge Levy requesting that the Clerk of the Court be directed to enter the default of defendant Bank Saderat PLC ("BSPLC") pursuant to Fed. R. Civ. P. 55(a). (DE 83).

As discussed in that application, and as reflected on the docket, BSPLC has dismissed its counsel and intentionally defaulted this action. *See* DE 82 (motion to withdraw); Order, 7/1/2019.

As Your Honor may recall, BSPLC recently followed the same course (dismissing its counsel and intentionally defaulting) in another case pending before Judge Glasser and Your Honor, *Lelchook v. Islamic Republic of Iran, et al.*, 16-cv-07078 (ILG)(rlm).

We thank you for your consideration.

Respectfully,


Robert J. Tolchin

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CERTIFICATE OF SERVICE

I certify that on August 27, 2019, the within letter was served on defendant Bank Saderat, PLC, by first class U.S. mail, postage prepaid, to: 5 Lothbury, London, UK, EC2R 7HD; and by email to borhani@saderat-plc.com.



Robert J. Tolchin